

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

21 CV 4110 (PKC)

- against -

CHARLIE ABUJUDEH,

Defendant.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Government's Memorandum of Law in Support of Application To Intervene and To Stay Civil Proceedings, the United States will move this Court on a date and time to be designated by the Court, before the Honorable Pamela K. Chen, United States District Judge, at the United States Federal Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, pursuant to Rule 24 of the Federal Rules of Civil Procedure, for intervention for the purpose of seeking a stay of civil proceedings, and for such other relief as the Court deems appropriate.

Dated: Brooklyn, New York  
October 21, 2021

Respectfully submitted,

BREON PEACE  
United States Attorney

/s/ Jonathan P. Lax

Jonathan P. Lax  
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Cc: Clerk of the Court (PKC)  
Nita Klunder, Esq (By ECF)  
Christopher Bruno, Esq. (By ECF)